

## **SUMMARY STATEMENT**

*State v. Medina*

Docket Nos. 45117 & 45118

The Idaho Supreme Court affirmed Jersson Neftaly Roque Medina's (Medina) conviction of trafficking heroin but vacated his conviction of conspiracy to violate the Uniform Controlled Substances Act. The Supreme Court held that no fundamental error occurred when Medina appeared at trial in chains because there was no compulsion on the part of the State. Because he was not compelled to wear shackles, there was no constitutional violation. However, the Court clarified that trial judges are still encouraged to intervene if a criminal defendant appears in shackles in the jury's presence. Additionally, the Court also held fundamental error occurred when the jury was given an instruction that included multiple legally insufficient overt acts in the conspiracy instruction. Accordingly, the Supreme Court vacated Medina's conviction for conspiracy to violate the Uniform Controlled Substances Act.